

August 31, 2007

MEMORANDUM

TO: File Folder #70228 Potomac River Generating Station, Mirant

FROM: Justin A. Wilkinson, Air Compliance Inspector

SUBJECT: Potomac River Generating Station, Mirant, Alexandria, Virginia

On August 31, 2007, Department of Environmental Quality (DEQ) personnel (Justin Wilkinson) performed an unannounced site visit at Mirant's Potomac River Generating Station. The plant is located at 1400 N. Royal Street, Alexandria, Virginia. The purpose of the site visit was to gather information on the status of the plant's stack merge project. DEQ personnel arrived at the facility at 9:50 a.m.

In the reception area of the plant, DEQ personnel was greeted by Ms. Debra Knight (Environmental Engineer, Mirant Potomac River, LLC). DEQ explained that the purpose of the site visit was to get an update on the status of the stack merge project and would be very similar to the site visit conducted on August 17 and 24, 2007. Ms. Knight said she would conduct a walk through of the areas of the plant where equipment and materials for the stack merge project are being stored. At this time, DEQ made the request to take pictures of the activities and staging areas, with relation to the stack merge project, inside of the plant. A brief meeting was then held with Mr. Mike Stumpf (Plant Manager, Mirant Potomac River, LLC) to discuss the DEQ request. Mr. Stumpf explained that it is company policy that no pictures be taken inside of the plant due to security reasons, but he would inquire with facility officials.

Ms. Knight then proceeded to conduct a tour of the facility. The tour began in the northwest parking lot/staging area. The smaller of the two cranes is staged in this area, along with large ductwork sections. It appears that the equipment staged in this area has not changed since the site visit conducted on August 24, 2007.

The tour then proceeded along the northern fence of the facility. In this area, contractor trailers; additional parts for the stack merge; and scaffolding, which has not been erected, is staged. The equipment staged in this area appeared similar to equipment which has been observed in previous site visits.

The tour then proceeded to the northeast side of the plant. In this area, the large crane remained staged but was not in use. Large duct sections, which have been observed in previous site visits, remained staged in this area.

The tour then proceeded inside of the plant. Ms. Knight led DEQ personnel along the pre-existing ID fans for each of the stacks. Equipment, which appeared to be electrical components for the new ID fans, was observed to be shrink wrapped and on pallets.

Scaffolding has been erected around duct work and the ID fans for Unit #4. Ms. Knight confirmed that this scaffolding is set in place for the asbestos removal crews. Also in this area, jack hammering was heard from the exterior of the building and debris was observed dropping into the interior of the plant around the ID fans of Unit #4. Additional equipment was observed to be staged in the northern end of the building in close proximity to the load-in door and start of the interior monorail system, which was installed the previous year to transport equipment related to the stack merge project.

The tour then proceeded to the exterior of the building to the bases of the stacks. Sections of structural beams, stairways, and other sections of walkways, were observed to be removed and lying on the ground of this level. In previous site visits, facility personnel explained that these sections were being removed in order to make room for the new ductwork to be run. A work crew was observed to be erecting scaffolding around the Unit #4 stack and associated ductwork. An area in close proximity to stack #4, was observed to have a pneumatic hammer and concrete saw. A section of the brick wall was observed to be removed. Workers were not observed in this area.

We then walked to the north side of the plant where pieces of fan housing and scaffolding were being stored. Some scaffolding stored in the yard north of the plant was for routine maintenance; other scaffolding was for the stack merge project. Mike Eckert pointed out a tool trailer that has arrived since the August 17, 2007 site visit. The tool trailer will support the stack merge project. An additional crew trailer has also arrived and was parked immediately north of the plant. The crew trailer will also support the stack merge project.

The tour concluded with a brief meeting with Mr. Stumpf. Mr. Stumpf explained that he had sent correspondence to facility officials pertaining to DEQ's request to take pictures inside of the facility. Mr. Stumpf reported that he had received a response and that this issue needed to be discussed further internally before permission was granted.

DEQ inspectors were offsite at approximately 10:55 a.m.